

BACKGROUND

A. General Background

2. On March 2, 2019 (the “Petition Date”), the debtor Insignia Technology Services, LLC (the “Debtor”) filed its voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court. The Debtor filed its proposed Amended Chapter 11 Plan of Reorganization on August 25, 2019 (Doc. 216). A final order was entered by this Court approving (i) the Disclosure Statement filed by the Debtor; (ii) confirming Debtor’s Amended Chapter 11 Plan; and (iii) granting Related Relief on October 11, 2019 (Doc. No. 290). The Court has scheduled a hearing for December 13, 2019 at 11:00 a.m. on all Final and Interim Fee Applications of Debtor’s Professionals.

B. Specific Background

3. Prior to the Petition Date, JBWK was retained by the Debtor to provide on-going professional legal services for employment related matters.

4. On July 16, 2019, this Court entered an order granting the Debtor’s application to employ and retain JBWK as employment legal counsel to the Debtor (Doc. No. 185).

5. On October 3, 2019, JBWK filed its First Interim Application for Compensation for legal services rendered in the amount of \$27,187.00 for the period from March 2, 2019 through October 3, 2019 (the “Application Period”) as employment legal counsel to the Debtor (Doc. No. 273), and this Court set the matter to be heard on November 8, 2019. (Doc. No. 280).

6. Subsequent to JBWK’s Notice of Hearing, this Court scheduled a hearing on all Final and Interim Fee Applications of the Debtor’s professionals to be heard on December 13, 2019 at 11:00 a.m. (Doc. No. 302).

7. JBWK has not rendered, and does not anticipate rendering, any additional legal services on behalf of the Debtor for which it will seek compensation from this Court and thus, seeks to retitle the First Interim Fee Application to its “First and Final Application for Compensation for Professional Services rendered as Debtor’s Employment Legal Counsel.”

8. In the interest of judicial economy, JBWK seeks to have its First and Final Fee Application heard with all Final and Interim Fee Applications scheduled on December 13, 2019 at 11:00 a.m.

9. This motion is made in good faith, in the interest of consolidating the hearings, and not for the purpose of delay.

10. Counsel for the Debtor has been consulted and does not oppose this request.

MEMORANDUM REQUIREMENT

11. Local Rule 9013-1(G) requires a memorandum with every motion except those listed in subparagraph (2). The memorandum may be combined with the motion pursuant to subparagraph (1). JBWK exercises its right to combine the memorandum with this Application.

CONCLUSION

WHEREFORE, for the reasons set forth herein, JBWK respectfully moves for a continuance of the November 8, 2019 Hearing (Doc. No. 280) on its First Interim Application for Compensation for professional legal services (Doc. No. 273), to consolidate this hearing with the December 13, 2019 hearing at 11:00 a.m. scheduled on all interim and final fee applications (Doc. No. 302.), and further to retitle its First Interim Application for Compensation as Debtor’s Employment Legal Counsel (Doc. No. 273) to its First and Final Application for Compensation

for Professional Services rendered as Debtor's Employment Legal Counsel, and such other relief as the Court deems appropriate.

Dated: October 29, 2019

Respectfully submitted,

Jones, Blechman, Woltz & Kelly, P.C.

By: /s/ Matthew D. Meadows

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